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Attorneys for Plaintiff

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Attorneys for Defendants

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

IGHE MESFUN,  
 Plaintiff,

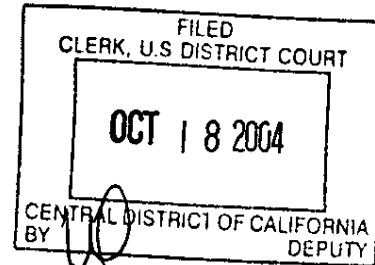
BESERAT HAGOS, et al.,

Defendants.

CY  
 ] CASE NO. 03-02182 MMM (RNBx)  
 ] STIPULATION AND [PROPOSED]  
 ] ORDER EXCLUDING DR.  
 ] MESGNA MEDHANE FROM  
 ] TESTIFYING AS A DEFENSE  
 ] EXPERT AND STRIKING HIS  
 ] EXPERT REPORT  
 ] Hearing date: Not set  
 ] Hearing time: Not set  
 ] Courtroom: 790 Roybal

PTC  
 ] DOCKETED ON CM Oct 4, 2004  
 ] Nov. 2, 2004

OCT 20 2004  
 BY 003



SCANNED

LODGED

SEP 29 PM 3:14  
 U.S. DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA  
 LOS ANGELES  
 BY

113

STIPULATION

WHEREAS, defendants' counsel listed Dr. Mesгна Medhane in their initial expert disclosure dated February 27, 2004;

WHEREAS, the parties met and conferred regarding contemplated motions *in limine* to exclude experts from trial and strike expert reports;

WHEREAS, during the meet and confer, counsel for defendants agreed that defendants would not call Dr. Medhane at trial and that Dr. Medhane's expert report would be stricken;

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1                   **IT IS HEREBY AGREED AND STIPULATED BY PLAINTIFF AND**  
2  
3 **DEFENDANTS** through their respective counsel that:

4           1.     Defendants are precluded from calling Dr. Mesгна Medhane at trial  
5 for any purpose;

6  
7           2.     Dr. Mesгна Medhane's expert report is hereby stricken; and

8           3.     This stipulation may be executed in counterparts and by facsimile.

9  
10 **IT IS SO STIPULATED.**

11                               Respectfully submitted,

12 Dated: September 29, 2004

BAHAN & ASSOCIATES  
THE LAW OFFICES OF RANDY RENICK

14 By: *Puja Batra*  
15 Puja Batra  
16 Attorneys for Plaintiff

17 Dated: September \_\_, 2004

LAW OFFICES OF JOSEPH M.  
LOVRETOVICH

19 By: \_\_\_\_\_  
20 Joseph M. Lovretovich  
21 Attorneys for Defendants

22 **ORDER**

23  
24 **IT IS SO ORDERED.**

25 Dated: *October 15, 2004*

*Margaret M. Morrow*  
HON. MARGARET M. MORROW  
UNITED STATES DISTRICT JUDGE

SCANNED

SCANNED

1 **IT IS HEREBY AGREED AND STIPULATED BY PLAINTIFF AND**  
2 **DEFENDANTS** through their respective counsel that:

- 3
- 4 1. Defendants are precluded from calling Dr. Mesgna Medhane at trial
- 5 for any purpose;
- 6
- 7 2. Dr. Mesgna Medhane's expert report is hereby stricken; and
- 8
- 9 3. This stipulation may be executed in counterparts and by facsimile.

10 **IT IS SO STIPULATED.**

11 Respectfully submitted,

12 Dated: September \_\_, 2004

BAHAN & ASSOCIATES  
THE LAW OFFICES OF RANDY RENICK

14 By: \_\_\_\_\_  
15 Puja Batra  
16 Attorneys for Plaintiff

17 Dated: September 29, 2004

LAW OFFICES OF JOSEPH M.  
LOVRETOVICH

19 By: \_\_\_\_\_  
20 Joseph M. Lovretovich  
21 Attorneys for Defendants

22 **ORDER**

23 **IT IS SO ORDERED.**

24 Dated: \_\_\_\_\_

25 \_\_\_\_\_  
26 HON. MARGARET M. MORROW  
27 UNITED STATES DISTRICT JUDGE  
28

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18, years and not a party to the within action; my business address is 140 S. Lake Avenue, Suite 230, Pasadena, California 91101.

On September 29, 2004, I served the foregoing document described as STIPULATION AND [PROPOSED] ORDER EXCLUDING DR. MESGNA MEDHANE FROM TESTIFYING AS A DEFENSE EXPERT AND STRIKING HIS EXPERT REPORT on the interested parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Joseph M. Lovretovich  
Law Offices of Joseph M. Lovretovich  
5850 Canoga Avenue, Suite 315  
Woodland Hills, CA 91367



**(By Mail)**

I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice I place all envelopes to be mailed in a location in my office specifically designated for mail. The mail then would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Pasadena, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

Executed on September 29, 2004.



**(By Personal Service)**

I caused such envelope to be delivered by hand to the offices of the addressee. Executed on September 29, 2004.



**(Federal Court)** I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Nathan Howe  
NATHAN HOWE